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May 20, 2010

Attention:

RE:

Great American Insurance

DATE	DESCRIPTION	HOURS	4 :
May-12-10	Read and review Notice of Removal and papers filed in support. Conferences with paralegal about finding out from Tenn. Dept. of Ins. when it served Great American. Research and read caselaw to determine timeliness of removal by defendant. Research and read Tenn. statutes regarding service on Tenn. Commissioner or Insurance and whether it constitutes service on foreign insurance company. Draft, proof and revise letter to defense counsel Davis.	4.00	
May-13-10	Read and review letter from lawyer for Great American containing their response to request to remand the case back to state court. Read and review case cited by Great American lawyer for position that remand back to state court not required. In preparation for filing motion to remand case for lack of timeliness of removal filing, read and review Tenn. statutes applicable to service of process on foreign insurance companies.	3.00	
May-15-10	Prepare initial draft of motion to remand and for fees and memo in support. Proof and revise initial drafts of the same.	3.00	
May-17-10	Proof and revise motion to remand and memo in support.	1.00	EXHIBIT C

May-18-10	Proof and revise motion to remand and memo in support.	0.75
May-20-10	Proof and revise memo in support of motion to remand. Prepare initial draft of affidavit of Pepper and multiple reviews and revisions to same. Review billing records to determine time spent related to notice of removal. Check all cited in affidavit and memo in support of motion to remand.	3.00
	Totals	14.75

Total Fee & Disbursements

Previous Balance

Balance Now Due